

SANTA MONICA MOUNTAINS CONSERVANCY

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Mr. Ronald J. Kosinski
Deputy District Director
Division of Environmental Planning
Department of Transportation, District 7
100 S. Main Steet, MS-16A
Los Angeles, California 90012

**Interstate 405 Sepulveda Pass Widening Project
Draft Environmental Impact Report/
Environmental Impact Statement
and Section 4(f) Evaluation**

Dear Mr. Kosinski:

The Santa Monica Mountains Conservancy (Conservancy) has reviewed the Draft Environmental Impact Report/Environmental Impact Statement and Section 4(f) Evaluation for the Interstate 405 Sepulveda Pass Widening Project (Project) with several questions and recommendations regarding proposed wildlife mitigation measures and impacts to natural communities. As proposed, both the Project and the City of Los Angeles' Sepulveda Boulevard Reversible Lane, Bike Lane, and Intersection Improvement Project (Sepulveda Widening Project) will have detrimental effects on wildlife movement across Sepulveda Pass. Caltrans shows great foresight working with the City of Los Angeles to substantially reduce these impacts and the Conservancy commends the cooperation between both agencies. The provision of a semi-shielded Skirball Bridge wildlife crossing "lane" is historic in southern California. However, we cannot ignore the incompleteness of mitigation measures without some design and funding mitigation for a Sepulveda Boulevard underpass. We urge both Caltrans and the City of Los Angeles to continue coordinating their efforts and mitigation measures to provide several long-term effective I-405/Sepulveda Boulevard wildlife crossings. At this juncture, it is best to maximize mitigation efforts to get as close as possible to this end.

Sepulveda Boulevard Underpass and I-405 (at Getty View Trailhead)

The Conservancy supports the addition of a culvert under the proposed north-bound on-ramp at Getty Center Drive. As mentioned in the Roth (2001) study, animals have been

documented to use the Sepulveda Boulevard underpass as a means to cross to the eastern portion of the Santa Monica Mountains. However, grading, lighting, and structural conditions (i.e. structural overhangs from the overpass), surrounding the culvert must be designed, or remains as is, to allow successful usage of the proposed culvert. We recommend that the culvert be a minimum of 2.5 meters in height and eight meters in width, and a maximum of 58 meters in length. However, we do not recommend wholesale removal of fencing along the right-of-way and the on- and off-ramps for northbound and southbound sides. Instead, replacing and adding fences for preventing wildlife from crossing both on- and off-ramps will help funnel wildlife to use the culvert and prevent motorist-wildlife collisions. As mentioned in our May 3, 2006 letter, we suggest building an eight foot high fence using wooden posts and large-sized rectangular mesh, instead of chain link fencing. The benefits of using this type of fencing construction would be for both aesthetics and effectiveness.

The Sepulveda Boulevard Reversible Lane, Bike Lane, and Intersection Improvement Project will have some biological affects in this area as well. We urge Caltrans to continue to coordinate their work with the City of Los Angeles to permanently maximize crossing efficiency in and around the Sepulveda Boulevard underpass.

Bel Air Crest Underpass

The mitigation measures for the Bel Air Crest underpass should also include the addition of wildlife crossing signage. The proposed right-of-way fencing should also be constructed using wooden posts and large-sized rectangular mesh.

Skirball Center Drive Wildlife Overpass

The mitigation measure of construction a wildlife staging area and bridge for the Skirball Center Drive Overpass requires ongoing coordinating with the City of Los Angeles' Sepulveda Widening Project. The final EIR must address the importance of also adding a crossing structure under Sepulveda Boulevard built by the City of Los Angeles. The final EIR/EIS should include design and funding mitigation for this underpass. An attached schematic of the Skirball Center Drive wildlife bridge illustrates a culvert running under Sepulveda Boulevard from the west side of the street to the wildlife staging area. The wildlife staging area then leads to the wildlife bridge on Skirball Center Drive. Wildlife will be able to cross between either side of Sepulveda Pass unobstructed by vehicles. Timing for both the construction of the culvert and wildlife bridge is critical to further prevent detrimental impacts to wildlife using Skirball Center Drive and Sepulveda Boulevard as a crossing.

One of the mitigation measures listed for the Skirball Center Drive overpass is a monitoring plan for before and during construction, and success criteria for after construction, of the proposed mitigation measures. The monitoring plan and success criteria should clarify if it will cover only Skirball Center Drive overpass, or if it will cover all three wildlife crossing. If the monitoring plan and success criteria is only for Skirball Center Drive overpass, the Conservancy recommends that this mitigation measure is applied, at some level, to all three wildlife crossings.

Vegetation: Biological Study Area - B (Sepulveda Pass Segment)

The Project does not mitigate for habitat loss except for possible impacts to walnuts, coast live oak, sycamores, and other native trees (4 inches dbh). Biological study area-b (BSA-B) is described to consist mostly disturbed habitat, either bare ground or ruderal and exotic plant species due to high traffic volume on the freeway, fuel modification, and initial disturbance caused from the original construction of the freeway. (Figure 3.18-2: Biological Study Area - B: Sepulveda Pass Segment in the DIER shows Biological Study Area - A, please provide the correct map for the final EIR.) Within the project footprint there are undisturbed areas of coast live oak and western sycamores that are commonly found in the bottoms of small canyons along the east side of I-405, where the majority of undisturbed areas covered by chaparral vegetation. These undisturbed areas provide good wildlife habitat.

Impacts from Alternative 2 and 3 will adversely affect these undisturbed vegetation areas and the wildlife it supports. There are no mitigation measures that would address these impacts. The impacts of the project will most likely leave disturbed areas that are either bare ground or filled with ruderal and exotic plant species, similar if not exactly like the result of the original freeway construction. Additionally, fuel modification will most likely be enforced due to the expansion of I-405 which will cause more disturbance and loss of wildlife habitat in previously undisturbed areas. To mitigate these impacts, the Conservancy recommends Caltrans to provide funding in an escrow account prior to impacts at \$75,000-per-acre to the Mountains Recreation and Conservation Authority (MRCA) to restore in publicly owned land in the Sepulveda Pass.

Section 4(f) Evaluation

The mitigation measures listed in the 4(f) Evaluation for Getty View Trailhead and Skirball Trailhead at Skirball Center must be included with the mitigation measures in Impacts to Land Use for the final EIR to be fully enforceable. These mitigation measures must state that Caltrans will reimburse the park improvement funding agencies to the full amount

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required by law, not just what the exact expenditures were in 1997. The reimbursements for both Getty View and Skirball Trailhead should include an additional \$2250 per original funding source to compensate MRCA staff time arranging reimbursement of funding sources and correcting accounting of the construction of each trailhead. Original funding sources are Proposition A and Environmental Enhancement Mitigation Program.

Please direct any questions or future correspondence to Paul Edelman at (310) 589-3230 ext. 128.

Sincerely,

ELIZABETH A. CHEADLE
Chairperson